

From: [Salinas, Amy](#)
To: [Werner, Robert](#)
Cc: [Johnson, Lydia](#)
Subject: FW: CES Environmental
Date: Tuesday, August 25, 2015 3:52:00 PM

See information below of where to send the extension letter.

From: Bill Rankin [mailto:billr@rankin-lawfirm.com]

Sent: Tuesday, August 25, 2015 3:51 PM

To: Salinas, Amy

Cc: Werner, Robert

Subject: RE: CES Environmental

Thank you. It would be helpful if you could send a copy of the confirmation letter to my office at the address below.

Bill Rankin

Law Office of William E. Rankin, PLLC

2440 South Boulevard

Suite 104

Houston, Texas 77098

Telephone: 713-360-6967

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From: Salinas, Amy [mailto:salinas.amy@epa.gov]

Sent: Tuesday, August 25, 2015 3:44 PM

To: Bill Rankin

Cc: Werner, Robert

Subject: RE: CES Environmental

I have been told that a 30 day extension is acceptable. We will send you a letter confirming your 30 day extension. Your client's response to our GNL is now due September 30, 2015.

Sincerely,

Amy Salinas

From: Bill Rankin [mailto:billr@rankin-lawfirm.com]

Sent: Tuesday, August 25, 2015 3:30 PM

To: Salinas, Amy

Subject: CES Environmental

Dear Ms. Salinas,

I represent Creekside Management, Inc. with respect to CES. The nexus documents included with

the GNL are all dated in 2007 and 2008 and each appears to represent waste generated by Advanced Aromatics, which then was transported to CES for disposal. During the period 2007-2008, Advanced Aromatics was a limited partnership and Creekside Management was its general partner. Enclosure 3 of the GNL indicates that Advanced Aromatics, L.P. was sent a GNL in February 2015. After some research, I understand that letter was sent to Advanced Aromatics' successor-in-interest. Creekside Management, Inc. sold the assets and certain liabilities to Advanced Aromatics, LLC a wholly owned subsidiary of Monument Chemicals, Inc. in February 2012. Creekside Management has since reduced its staff to two persons and maintains a single small office only intermittently occupied. As a result of Creekside reducing its workforce in anticipation of ultimately winding up its affairs, the GNL did not reach my desk until early August.

While Creekside retained certain liabilities in the transaction, all of the files associated with the former limited partnership were transferred to the buyer. Because Creekside has not received notice or any request to indemnify Advanced Aromatics LLC, I was not aware of the prior letter until I received the one addressed to Creekside Management.

The reason for my calls the last few days is because I have begun my research into this matter in order to prepare a response. I would like to discuss the situation with Karen Walter of Lubrizol, who's contact information you passed along last week. I have a call into her, but have not yet heard back. I also plan on inquiring as to whether I will have a chance to review those files transferred during the acquisition so that I can better understand the scope of potential liability.

Due to these limits on my ability to gather the necessary information to make an informed response, I am respectfully requesting an extension to reply to the GNL until September 30, 2015.

I appreciate your consideration of this request.

Best regards,

Bill Rankin

Law Office of William E. Rankin, PLLC

2440 South Boulevard

Suite 104

Houston, Texas 77098

Telephone: 713-360-6967

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